

From: [Ackerman, Mark](#)
To: [Rosenberg, Kathryn](#)
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)
Date: Thursday, September 23, 2021 8:07:00 AM

Hi Katie. I will look at this and get back to you by the end of this week.

Mark Ackerman (he/him/his) | Water Division Permits Branch, U.S. Environmental Protection Agency | 77 W. Jackson Blvd., Chicago, IL 60604 | ph: 312-353-4145 |

From: Rosenberg, Kathryn <Rosenberg.Kathryn@epa.gov>
Sent: Wednesday, September 22, 2021 3:11 PM
To: Ackerman, Mark <ackerman.mark@epa.gov>
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

Hi Mark,

I just finished taking a first look at the changes to this permit. Michigan has made most of the required and recommended changes. Two notes:

Public Notice

1. The PN is still missing quantitative statement of the alternative thermal effluent limits proposed as required by 40 CFR 124.57(b)(1).

Permit

2. The effluent tables for outfalls which discharge FATW (001A, 001F, 001H) have been modified as required, but the following statement is now included, "During the period beginning on January 1, 2024, and lasting until the expiration date of this permit, the permittee is authorized to discharge 19.4 MGD of previously generated fly ash transport water.."

I think that this language complies with 40 CFR 423.13(h)(1)(i) ("This limitation applies to the discharge of fly ash transport water generated on and after the date determined by the permitting authority.."), but just wanted to double check.

Otherwise, I think everything looks good.

-Katie

From: Miller, Deborah L. <miller.deborahl@epa.gov>
Sent: Friday, September 10, 2021 12:34 PM
To: Rosenberg, Kathryn <Rosenberg.Kathryn@epa.gov>
Cc: Ackerman, Mark <ackerman.mark@epa.gov>; Schaller, Andrea <schaller.andrea@epa.gov>
Subject: FW: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

FYI

From: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>

Sent: Friday, September 10, 2021 12:22 PM

To: Miller, Deborah L. <miller.deborahl@epa.gov>

Cc: alexanderc2@michigan.gov; Buckmaster, Tarek (DEQ) <BUCKMASTERT@michigan.gov>

Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

Deborah,

Thank you for providing comments on the DTE-Monroe permit. EGLE's responses – organized and numbered in the same manner as the comments – are provided below, and the revised draft permit is attached. Following final review of this draft permit by DTE, we expect it to proceed to public notice.

If you have any questions or comments, please contact me.

Christine

Public Notice

1. The following statement has been added to the Public Notice Document: The permittee previously conducted a demonstration pursuant to Section 316(a) of the Clean Water Act; this was approved by the Michigan Water Resources Commission on October 21, 1976, and is continued under this permit reissuance.

Permit

1. The limits for both oil & grease and TSS at monitoring point 001D have been changed to reflect those specified for low volume waste in 40 CFR 423.12(b)(3), and are expressed as concentration limits rather than loading rate limits as allowed for under the ELGs. Please see Part I.A.3. of the attached permit.
2. Monitoring point 001F has been revised to reflect the permit requirements that will go into effect for FATW beginning no later than January 1, 2024. Monitoring points 001A and 001H, which also authorize a discharge of FATW, have been similarly revised. Please see Part I.A.1., Part I.A.4., and Part I.A.6. of the attached permit.
3. The permit has been revised to specify that the EGLE will evaluate and determine the site-specific volume of BATW to be authorized in the permit, and a reopener provision has been added to the permit. Please see Part I.A.5., Part I.A.6., and Part I.A.15. of the attached permit.

Fact Sheet and Permit Record

1. The following statement has been added to the Basis for Decision Memo: For information pertaining to the non-attainment status for certain designated uses of the receiving water and

how it informed the establishment of certain permit conditions, see the Department's document named "DECO Monroe fact sheet & PEL.pdf."

2. The following statement has been added to the Basis for Decision Memo: For information explaining which ELGs apply and the basis for this determination, as well as the calculations made in accordance with these ELGs, see the Department's document named "TTBEL Memo.doc."
3. The Treatment Technology-Based Effluent Limitation Guidelines Memo has been revised to include the following statements: There are four generating units at this facility: Unit 1, brought on line in May 1971; Unit 2, brought on line in June 1972; Unit 3, brought on line in March 1973; and Unit 4, brought on line in May 1974. The New Source date for direct dischargers under these federal effluent limitation guidelines is November 19, 1982 (see https://www.epa.gov/sites/default/files/2015-09/documents/pwm_app-d.pdf), meaning that none of the discharges from this facility are subject to New Source Performance Standards under 40 CFR 423.

Permit

1. Part I.A.20. – Cooling Water Intake Structures – Interim Approval, has been revised as requested. Please see Part I.A.20. of the attached permit.
2. Part I.A.19. – 316(a) Thermal Demonstration Update, has been revised as requested under parts a. and b. of this comment. Please see Part I.A.19. of the attached permit.

Christine Aiello

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From: Miller, Deborah L. <miller.deborahl@epa.gov>

Sent: Friday, July 9, 2021 3:05 PM

To: Alexander, Christine (EGLE) <ALEXANDERC2@michigan.gov>

Cc: Aiello, Christine (EGLE) <AIELLO@michigan.gov>

Subject: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

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Stay safe,

De'bo'rah L. Miller

Administrative Assistant

SEE Enrollee Working with US EPA

Water Division – Permits Branch

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